

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff;

v.

COMMONWEALTH OF PUERTO RICO,
ET AL.,

Defendants.

No. 12-cv-2039 (GAG/PG)

**JOINT MOTION FOR EXTENSION OF TIME TO SUBMIT
SUPPLEMENTAL JOINT MOTION INFORMING COURT OF MATTERS
RELATED TO THE AFTERMATH OF HURRICANE MARIA**

COME NOW, Plaintiff, the United States of America, and Defendants, the Commonwealth of Puerto Rico, et al., (collectively, the Parties), and respectfully request an extension of time until **March 9, 2018**, to submit a supplemental joint motion informing the Court of matters related to the aftermath of Hurricane Maria (“Supplemental Joint Motion”), pursuant to this Court’s Order of October 4, 2017. ECF No. 624. At the Commonwealth’s request, the Court granted an initial extension of time to file the Supplemental Joint Motion, until February 23, 2018, to permit the Puerto Rico Police Bureau (“PRPB”) to complete a post-hurricane impact assessment for the Supplemental Joint Motion. The Commonwealth completed the impact assessment on February 22, 2018. The additional two weeks will allow the Parties to review the impact assessment, negotiate potential modifications to the Commonwealth’s action plans, and present a joint proposal to the Court for approval, pursuant to Paragraph 239 of the Agreement for the Sustainable Reform of the Puerto Rico Police Department (“Agreement”), ECF No. 60.

1. On October 4, 2017, the Court instructed the Parties to work with the Technical Compliance Advisor (“TCA”) to address the significant challenges to the police reform process arising from the passage of Hurricane Maria. ECF No. 624. Specifically, the Court instructed the Parties and the TCA to: (1) determine whether modifications to existing court-approved action plans are necessary; (2) identify vital training needs, and (3) continue making progress on policy development. *Id.* at 2-3.

2. On December 1, 2017, the Parties filed a Joint Motion Informing the Court of Matters Related to the Aftermath of Hurricane Maria (“Joint Motion”). ECF No. 656. The Parties described their work assessing the impact of Hurricane Maria on existing compliance plans and negotiating initial modifications to certain training deadlines. The Parties also notified the Court that a comprehensive impact assessment was necessary to determine the need for additional modifications. The Court instructed the Parties to file their Supplemental Joint Motion by January 31, 2018. Order at 2, ECF No. 644.

3. On January 31, 2018, the Commonwealth requested an extension of time until February 23, 2018 to provide PRPB with additional time to complete its comprehensive impact assessment. ECF No. 716. The impact assessment is intended to assist the Parties in determining whether additional modifications are necessary to overcome hurricane-related challenges. The Court granted the extension of time as requested. Order, ECF No. 717.

4. On February 22, 2018, PRPB submitted its comprehensive impact assessment to the United States for review. The report seeks significant extensions to various activities in the court-approved action plans to account for the damage and delay occasioned by Hurricane Maria. The Parties will need sufficient time to review PRPB’s impact assessment, consider related assessments by the TCA, negotiate potential modifications to the court-approved action plans,

and submit these modifications to the Court for approval as part of their Supplemental Joint Motion. To complete these critical steps, the Parties agree to work collaboratively and expeditiously with the TCA to submit the Supplemental Joint Motion by March 9, 2018.

WHEREFORE, the Parties respectfully request an extension of time until March 9, 2018 to complete negotiations on proposed modifications to the court-approved action plans and file their Supplemental Joint Motion.

Respectfully submitted, this 23rd day of February, 2018,

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AMERICA:

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 23rd of February, 2018, I filed the foregoing pleading electronically through the CM/ECF system, which caused the parties, counsel of record and the Technical Compliance Advisor on the service list to be served by electronic means.

s/Luis E. Saucedo
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